

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: APPLICATION OF OMAR
ALGHANIM FOR AN ORDER TO
TAKE EXPEDITED DISCOVERY
FOR USE IN FOREIGN
PROCEEDING PURSUANT TO 28
U.S.C. § 1782

Misc. Action No.:

**APPLICATION OF OMAR ALGHANIM FOR AN ORDER
TO TAKE EXPEDITED DISCOVERY FOR USE IN FOREIGN PROCEEDING
PURSUANT TO 28 U.S.C. § 1782**

Petitioner Omar Alghanim, pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit 3 to the Declaration of Robert Van Kirk (the “Van Kirk Declaration”) filed February 1, 2021, authorizing Petitioners to take discovery for use in pending proceedings before the Commercial Court of Kuwait in the form of the subpoenas attached as Exhibit 4 to the Van Kirk Declaration. In support of this petition, Petitioner submits a Memorandum of Law and attaches the Van Kirk Declaration, the Declaration of Bader El Jeaan, and the Declaration of Omar Alghanim.

Dated: February 1, 2021

WILLIAMS & CONNOLLY LLP

/s/ Robert Van Kirk

Robert Van Kirk (*pro hac vice forthcoming*)
David S. Kurtzer-Ellenbogen
650 Fifth Avenue, Suite 1500
New York, NY 10019

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.
Washington, DC 20005
T: (202) 434-5000
F: (202) 434-5029
rvankirk@wc.com
dkurtzer@wc.com

Counsel for Petitioner